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April 7, 2005

Hon. James H. Welsh Commissioner of Conservation Office of Conservation Post Office Box 94275 Baton Rouge, Louisiana 70804-4275

Re:

Upper Wilcox Sand, Reservoir D

Wilcox Sand, Reservoir G

Pine Prairie Field

Evangeline Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **NEUMIN PRODUCTION COMPANY** for the calling of public hearings, after legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters relating to the Upper Wilcox Sand, Reservoir D, and the Wilcox Sand, Reservoir G, all in the Pine Prairie Field, Evangeline Parish, Louisiana:

Upper Wilcox Sand, Reservoir D

- 1. To establish rules and regulations and to create three (3) drilling and production units for the exploration for and production of oil and gas from the Upper Wilcox Sand, Reservoir D, in the Pine Prairie Field, Evangeline Parish, Louisiana, said units to be designated U WX RD SUA, U WX RD SUB and U WX RD SUC, all as shown on the plat attached hereto and made a part hereof.
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed units with each tract sharing in unit production on a surface acreage basis of participation.
- 3. To provide that any future wells drilled to the Upper Wilcox Sand, Reservoir D, in the Pine Prairie Field, should be drilled in accordance with the spacing provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).

- 4. To provide that the Commissioner of Conservation should be authorized to reclassify the Upper Wilcox Sand, Reservoir D, in the Pine Prairie Field, by supplemental order without the necessity of a public hearing if the producing characteristics of such reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.
 - 5. To consider such others matters as may be pertinent.

The Upper Wilcox Sand, in the Pine Prairie Field, Evangeline Parish, Louisiana, was previously defined in Office of Conservation Order No. 32-K, effective November 25, 1980.

Wilcox Sand, Reservoir G

- 1. To establish rules and regulations and to create a single drilling and production unit for the exploration for and production of oil and gas and/or gas and condensate from the Wilcox Sand, Reservoir G, in the Pine Prairie Field, Evangeline Parish, Louisiana, said unit to be designated WX RG SUA, as shown on the plat attached hereto and made a part hereof.
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit with each tract sharing in unit production on a surface acreage basis of participation.
- 3. To provide that any future wells drilled to the Wilcox Sand, Reservoir G, in the Pine Prairie Field, within or outside of the proposed unit, should be located in accordance with the spacing provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
- 4. To provide that the Commissioner of Conservation should be authorized to reclassify the Wilcox Sand, Reservoir G, in the Pine Prairie Field, by supplemental order without the necessity of a public hearing if the producing characteristics of such reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.
 - 5. To consider such others matters as may be pertinent.

The Wilcox Sand, in the Pine Prairie Field, Evangeline Parish, Louisiana, was previously defined in Office of Conservation Order No. 32-J-6, effective December 15, 1976.

Pertinent data, including well logs, may be obtained **AT THE COST OF THE REQUESTING PARTY** from Louis Gilbert Associates, 3636 North Causeway Blvd., Ste. 204, Metairie, Louisiana, 70002, Telephone Number (504) 836-6393.

Pursuant to the Revised Rules of Procedure, a pre-application conference was held on April 4, 2005, in Lafayette, Louisiana, at which the parties named on the attached list were in attendance. The conference was opened by representatives of the applicant who explained the bases for the units being requested. Questions were asked and answered. The conference was then adjourned. As the result of additional discussions with a represented party since the

conference, the applicant has revised the north boundary of its proposed WX RG SUA. In all other respects, the unit proposals remain unchanged.

Attached hereto and made a part hereof are plats outlining the applicant's proposals, the conference attendance list and the list of the names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom a copy of this application is being mailed. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation; however, the list of parties will be furnished to any party requesting copies. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed is our check on behalf of the applicant, in the amount of \$1,510.00 made payable to the Office of Conservation and representing the required hearing application fee.

Very truly yours,

RWRjr/dbf Attachments

Richard W. Revels, Jr.

cc: Mr. Richard Hudson, Lafayette District Office of Conservationcc: Interested Owners, Represented Parties and Interested Parties

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